

STATE OF NEW YORK  
COUNTY COURT

COUNTY OF ERIE

HSBC BANK USA, N.A.,

-VS-

Plaintiff,

ATTORNEY'S  
AFFIRMATION

LORI M. HUGHES, if living and if he  
be dead, and all Persons who are wives,  
lienors, heirs, devisees, distributes,  
successors in interest of such of them  
as may be dead, and their husbands and  
wives, heirs, devisees, distributes, and  
successors in interest all of whom and whose  
names and places are unknown to Plaintiff;  
NEW YORK STATE DEPARTMENT OF  
TAXATION AND FINANCE;  
UNITES STATES OF AMERICA; JOHN W.  
DORN, Esq., AS GUARDIAN AD LITEM &  
MILITARY ATTORNEY;

Defendants.

Index No. 2013600069

STATE OF NEW YORK )  
COUNTY OF [COUNTY] ) ss:

Your affiant being duly sworn deposes and says:

1. I am an attorney duly admitted to practice law in the State of New York, and am a partner in the law firm FEIN, SUCH and CRANE, LLP, attorneys for the plaintiff herein.
2. This affirmation is made in support of your affiant's application for attorney's fees in the above-captioned mortgage foreclosure proceeding.
3. Your affiant has performed or will perform the following services relative to the herein mortgage foreclosure action:
  - a. Review original file, including mortgage(s) and note(s), credit application, appraisal report, abstract of title, bank notes, etc. .75 hr
  - b. Obtain redated abstract and review same. .5 hr
  - c. Prepare and file index number and Lis Pendens, prepare Summons and Complaint and file same. 2.0 hrs

d. Arrange for Service of Complaint on defendants, monitor service record service completion and track default dates	.75 hr
e. Prepare attorney's Affidavit of Regularity, Order of Reference, Referee's Oath, Bill of Costs and client's Affidavit of Merit.	1.5 hrs
f. Receive and review Oath and Report of Amount due. Prepare Judgment of Foreclosure and Sale, forward same to client.	1.75 hrs
g. Prepare affirmation of service by mail, Notice of Foreclosure, Terms of Sale.	.75 hr
h. Arrange for publication of sale.	.5 hr
i. Prepare Referee's Deed, Referee's Report of Sale and Statement of Sale.	.75 hr
j. Arrange for sale of property.	.75 hr
k. Prepare order confirming referee's report of sale and forward to Court.	.5 hr
l. Miscellaneous communication with client, Supreme Court, and referee.	.5 hr
m. Miscellaneous accounting chores.	1.0 hrs
<b>TOTAL</b>	<b>12.0 hours</b>

4. Your affiant has been admitted to the practice of law since March, 2011, and concentrates in the collection of unpaid debts. Your affiant's customary usual fee for services rendered is \$150.00 per hour.

5. Based upon the foregoing, your affiant requests an attorney's fee allowance in the above-captioned matter in the sum of \$1,800.00.

6. Paragraph 22, Line 10 of the Mortgage sets forth the Plaintiff's right to seek attorney's fees in the event of foreclosure.

7. The undersigned affirms by penalty of perjury the foregoing statements are true.

Dated: July 17, 2014

  
 Craig K. Beideman, Esq.  
 Fein, Such & Crane, LLP